## 36 PAGE 933

PHYLLIS P. BREIDENBAUGH

IN THE

Plaintiff

CIRCUIT COURT

-V-

FOR FREDERICK COUNTY

JOSEPH A. SCHAFER, II

EQUITY # 25,849

Defendant

ANSWER TO BILL FOR PARTITION OF PROPERTY AND APPOINTMENT OF TRUSTEE TO MAKE SALE

TO THE HONORABLE, THE JUDGE OF SAID COURT:

The Defendant, Joseph A. Schafer, II, by Neil J. Lewis, his attorney in Answer to the Bill for Partition of Property and Appointment of Trustee to Make Sale, saids:

- 1. That the Defendant admits that the property was deeded to himself and the Plaintiff on November 5, 1969.
  - 2. The Defendant admits paragraph two.
  - 3. The Defendant admits paragraph three.
  - 4. The Defendant admits paragraph four.
- 5. The Defendant denies that the division of the property is necessary. The Defendant states that he acquired the property in 1955 and held such property for a period of fourteen (14) years prior to his marriage to the Plaintiff. He further states that he expended Seven Thousand (\$7,000.00) Dollars of his money prior to his marriage to the Plaintiff for said property. The Plaintiff was added merely as a convenience in 1969 and did not contribute toward the purchase or upkeep of said property.
- 6. The Defendant further adds that the Plaintiff is without interest in said property.

WHEREFORE, the Defendant having answered the Bill for Partition and Appointment of Trustee respectfully request this Honerable Court to dismiss the same.

> NEIL J. LZWZS, ESQUIRE 253 Equitable Building Baltimore, MD 21202

727-7642